REMARKS

Appended to this response is an Appointment of Associate Attorney along with a change of correspondence address to customer number 29683. The entry of this data into the file jacket is respectfully requested.

The specification has been amended to provide the serial numbers and current status of the related applications. Note that the entry for Attorney Docket No. NC30556 has been deleted, as it identifies the instant patent application. Note also that the entry for Attorney Docket No. NC30578 has been deleted, as the undersigned attorney was informed that this particular patent application was not filed.

Claims 1-8 and 10-12 have been rejected under 35 U.S.C. 102(e) as being anticipated by Bickmore et al. (U.S. 6,466,213), while claims 9 and 13 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Bickmore et al. in view of Praitis et al. (U.S. 6,594,697). These rejections are respectfully disagreed with, and are traversed below.

The Examiner has stated that Bickmore et al. teaches an entity that includes an addressing mechanism (claim 1) an identifier associated with an entity bookmark (claim 2) and entity that comprises or includes a bookmark (claims 3, 4, 7 and 8), and has referred to col. 2, lines 31-45, and to other related location. This characterization of the teaching of Bickmore et al. is respectfully disagreed with.

Fig. 8 shows the logical representation of the avatar ASL (Avatar Scripting Language) file 500 of Bickmore et al. Referring also to col. 7, lines 43-49, what is stated is that an:

> "..avatar statement 510 specifies a symbolic name for an avatar, an identifier, followed by the path name to the avatar definition file. The avatar script file 520 includes avatar scripts 521-52m. The avatar scripts 521 and 522 contain specific commands such as, for example, "pose:fpose.right arm up" and "pose:fpose.right arm down"."

There is no disclosure of the avatar including or comprising an addressing mechanism or a bookmark or a URI.

Instead, a careful reading of Bickmore et al. shows that the avatar is intended to interact with hyperlinks that are located <u>in a document</u> for navigating within a document or between documents. There is no disclosure or suggestion that the avatar includes or comprises an addressing mechanism or a bookmark or a link to an address or a URI. For example, reference can be made to col. 8, lines 48-64:

> "Three other primitives allow the avatar to <u>simulate mouse clicks on document objects,</u> thus enabling the avatar to give a guided tour through a series of hypertext linked objects....Finally, the primitive "CLICK object" performs the same actions as if a document reader had clicked on the specified object with the mouse. Execution of the "CLICK object" primitive may be accompanied by an audible click sound." (emphasis added);

and to col. 9, lines 13-59:

> "From the above-outlined description, it is obvious that <u>the avatar is invoked when a link to the avatar is activated</u>. In HTML, links to particular locations in a document, or between locations in the same document, are made possible through the NAME attribute of the "A" anchor element. The "A" anchor element marks a block of the document as a hypertext link. The block can be text, highlighted text, or an image. The "A" anchor element can take several attributes. At least one attribute must be either "HREF" or "NAME". "HREF" specifies the destination of the hypertext link, while "NAME" indicates that the marked text can itself be the destination of a hypertext link. If both attributes are present, the anchor is the beginning of one link and end of another link. <u>The NAME attribute allows the avatar creator to assign a unique name, called a fragment identifier, to a particular place in a document. The avatar creator can then link this particular name location using a special form of URL that contains the name. The link can be made within the same document, or from any other document.</u>
>
> The avatar system takes advantage of this feature of HTML. Once created, <u>the avatar ASL script files and avatar definition files can be linked to an electronic</u>

document, for example, to provide additional details, to express opinions, and/or
to navigate a reader through the electronic document. In an exemplary
embodiment, the avatar script and definition files are used in conjunction with a
hypertext document rendering system, such as an HTML web browser, which
supports annotating objects on a page of the electronic document. The objects
include words, sentences, paragraphs and figures. The objects are annotated with
hypertext links, symbolic names and other properties. Avatar links are highlighted
in a color different from that used to highlight regular hypertext links. For
example, if regular hypertext links are displayed in blue, the avatar links may be
displayed in red. Avatars are attached to the electronic document by specifying
a special avatar reference property associated with the page object.

In HTML, this is accomplished by adding an "AREF" attribute to the HTML "A"
tag. AREF specifies an avatar description file and a script file. For example, the
tag:

<A AREF="tim.asl"# ok1> ... </A>

wrapped around a paragraph in an HTML page specifies that the behavior
"ok1" for the avatar defined in "tim.asl" is to be associated with the
paragraph. This mechanism may be used to associate comments or narratives
about the annotated object by the person represented by the specified avatar."
(emphasis added)

Based at least on the foregoing portion of Bickmore et al., it should be clear that the avatar *per
se* of Bickmore et al. is not disclosed to include or comprise an addressing mechanism or a
bookmark, but instead is intended to interact with links inserted into a document of interest.

In any event, certain of the claims have been clarified by amendment so as to even further
distinguish the entity of this invention from the avatar of Bickmore et al. For example, claim 1
now recites in part that an entity "comprises a plurality of components that are suitable for
storage in a memory device, one of said components comprising an addressing mechanism that
comprises a representation of at least one address" (emphasis added). Support for this claim
amendment is found at least in Fig. 2, in paragraphs [0068] to [0071] and in Fig. 10. Claim 1 is
clearly patentable over the avatar of Bickmore et al., for the reasons discussed above (e.g., there
is no apparent disclosure or suggestion of the avatar comprising "an addressing mechanism that

comprises a representation of at least one address").

Further by example, claim 2 has been amended to state that "an entity is provided so as to comprise a plurality of components that are suitable for storage in a memory device, one of said components comprising said entity bookmark". Claim 2 is thus clearly patentable over the avatar of Bickmore et al., for the reasons discussed above.

Further by example, claims 3 and 4 have each been further clarified by amendment to recite that in the entity that comprises at least one bookmark, "the bookmark provides an addressing mechanism that comprises a representation of at least one address." Claims 3 and 4 are thus clearly patentable over the avatar of Bickmore et al., for the reasons discussed above. Further, it is not admitted that the avatar of Bickmore et al. comprises a "media pool" as claimed and described in the instant patent application.

Claims 7 and 8 have also been clarified by amendment in a somewhat similar manner, and are also deemed to be patentable and allowable over the avatar described by Bickmore et al.

In that the independent claims are all patentable, then the dependent claims are all patentable as well, whether considered only with Bickmore et al. or with Bickmore et al. and Praitis et al.

The Examiner is respectfully requested to reconsider and remove the rejection of claims 1-13, as now clarified by amendment, and to allow these claims.
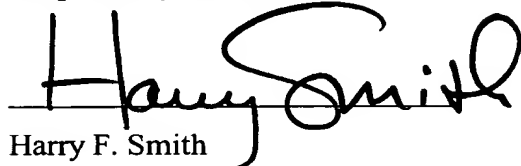
Claims 14-18 are new, and are also deemed to be allowable and patentable over the prior art that was cited and relied upon by the Examiner. Support for these claims can be found throughout the specification as filed. For example, support for claim 16 can be found at least in paragraphs [0040] and [0041], and support for claims 17 and 18 can be found at least in paragraphs [0026] and [0027]. No new matter is added by the presentation of claims 14-18.

The Examiner is respectfully requested to reconsider the rejections in view of the claims as

clarified by amendment and as newly added, and to issue a timely notification of the allowance of claims 1-18.

Respectfully submitted:

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_5/10/04_   _Elaine F. Mian_

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